

DOCKET FILE COPY ORIGINAL

RECEIVED

Before the  
Federal Communications Commission  
Washington, DC 20554

SEP 22 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments ) MM Docket No. 97-168  
FM Broadcast Stations ) RM-9103  
(Arcadia, Missouri) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

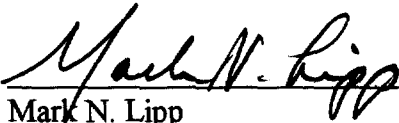
COMMENTS

Columbia, FM, Inc. ("CFI"), licensee of Station KPLA(FM), Columbia, MO, by its counsel, hereby submits comments to the Notice of Proposed Rule Making (DA 97-1599 , rel. Aug. 1, 1997) in the above referenced proceeding. The Notice proposed the allotment of Channel 269A to Arcadia, MO. CFI operates on Channel 268 as a class C2 and has an application pending for class C1 facilities under Sec. 73.215 of the Commission's Rules (BPH 930813 IC).

CFI is in the process of preparing an application for Station KPLA to eliminate a short spacing and become a full Class C1 station under Section 73.207 at its proposed site. However, the allotment of Channel 269A at Arcadia will have an indirect effect on KPLA's ability to do so. CFI has conducted a channel search and has found an alternate class A channel for Arcadia to provide a first local service. According to the attached channel study, Channel 224A can be allotted to Arcadia provided that Channel 240C3 is substituted for Channel 224A or Channel 225A at Ironton, MO in MM Docket 97-136.

No. of Copies rec'd 024  
List ABCDE

Accordingly, in the event the Commission does allot Channel 240C3 in MM Docket 97-136, CFI requests that the Commission allot Channel 224A to Arcadia instead of Channel 269A.

By:   
Mark N. Lipp  
Ginsburg, Feldman and Bress,  
Chartered  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 637-9086

Its Counsel

September 22, 1997

ALAN GERMOND  
COLUMBIA, MO

Page 1  
September 22, 1997

FM Spacing study

Title: ARCADIA, MO  
Channel 224A ( 92.7 MHz)  
Database: DW 09/18/97

Latitude: 37-30-33  
Longitude: 90-42-30  
Safety zone: 20 km

Call City of License	Auth License name St. FCC File no.	Chan Freq ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
ALLOC DIXON	MO DOC-92-214	221A 92.1	37-58-30 92-10-10	292.4 111.5	138.8 107.8	31 CLEAR
RM-8146; SITE RESTRICTION 4.2 MI W						
WIL-FM LIC SAINT LOUIS	WIL MUSIC, INC. MO BLH-890707KC	222C 100 92.3	38-28-56 90-23-53	14.0 194.2	111.4 16.39	95 CLEAR
NEW APP POPLAR BLUFF	GEORGE S. FLINN, JR. MO BPH-970709MB	223A 6 92.5	36-51-10 90-25-27	160.9 341.1	77.09 5.092	72 CLOSE
Received per FCC release #24038 dated 07/22/97						
NEW APP POPLAR BLUFF	VIANDS ENTERPRISES, INC. MO BPH-970708MA	223A 2.20 92.5	36-45-46 90-26-03	163.6 343.8	86.34 14.34	72 CLOSE
Received per FCC release #24037 dated 07/21/97						
ALLOC POPLAR BLUFF	MO DOC-97-54	223A 92.5	36-45-30 90-23-54	161.7 341.9	87.76 15.76	72 CLOSE
Granted effective 06/09/97, adopted 04/16/97, released 04/25/97; Filing window 06/09-07/10/97 **CLOSED** ; RM-8989						
NEW APP POPLAR BLUFF	DANNY RAMSEY & BRUCE VAN MO BPH-970708MB	223A 4.50 92.5	36-43-08 90-23-48	162.4 342.6	91.97 19.97	72 CLEAR
Received per FCC release #24037 dated 07/21/97						
KYLS-FM LIC IRONTON	DAVID E SMITH COMMUNICAT MO BLH-840113AK	224A .65 92.7	37-34-23 90-41-35	10.7 190.7	7.218 -108	115 SHORT
Deletion proposed; ONE-STEP APPLICATION TO CHANGE TO 225A; Was KYLS 08/11/97 per FCC release #312 dated 08/15/97						
PRM IRONTON	MOVE FROM 225A PROPOSED MO DOC-97-136	224A 92.7	37-34-23 90-41-35	10.7 190.7	7.218 -108	115 SHORT
PRM adopted 05/14/97, released 05/23/97; RM-9083						
KMAL MALDEN	LIC BBC, INC. MO BLH-791105AC	224A 3 92.7	36-33-08 89-58-42	148.4 328.9	124.5 9.488	115 CLOSE
Deletion proposed; ONE-STEP APPLICATION TO CHANGE TO 225C3						
WVZA HERRIN	LIC 3-D COMMUNICATIONS CORP. IL BLH-961002KB	224B1 25DA 92.7	37-46-28 89-05-50	77.8 258.7	145.2 2.213	143 CLOSE
Call Granted 10/04/91 per FCC release #168 dated 10/04/91; DA: Klectroni Reme arch Inc LP-4R-DA @ 0 deg						
KYLS-FM CP IRONTON	DAVID E. SMITH COMM, INC MO BPH-931230IE	225A .77 92.9	37-34-23 90-41-35	10.7 190.7	7.218 -64.8	72 SHORT
Deletion proposed; CP Granted 05/17/95 per FCC release #* dated 05/25/95; CP G ranted 05/17/95 per FCC release #* dated 05/25/95; 1-8 BP APP TO CHANGE FROM 2 24A;BMPH-961101JD EXT GRD 1/24/97(43915-1/24/97); Was KYLS 08/11/97 per FCC re lease #312 dated 08/15/97						

ALAN GERMOND  
COLUMBIA, MO

Page 2  
September 22, 1997

FM Spacing study

Title: ARCADIA, MO  
Channel 224A ( 92.7 MHz)

Latitude: 37-30-33  
Longitude: 90-42-30

Call	Auth Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	from	(km) (km)
PRM	MOVE TO CHANNEL 224 PROP	225A		37-34-23	10.7	7.218	72
IRONTON	MO DOC-97-136	92.9		90-41-35	190.7	-64.8	SHORT
Deletion proposed; PRM adopted 05/14/97, released 05/23/97; RM-9083							
PRM	MOVE FROM CLASS C3 PROPO	225C2		36-39-48	139.0	124.2	106
WALDEN	MO DOC-97-136	92.9		89-47-39	319.5	18.17	CLEAR
PRM adopted 05/14/97, released 05/23/97; RM-9083							
KBDZ	LIC DONZE COMMUNICATIONS INC	226A	1.60	37-38-56	76.9	69.69	31
PERRYVILLE	MO BLH-910131KC	93.1	190	89-56-21	257.3	38.69	CLEAR
Was KRAA 09/21/90 per FCC release #143 dated 09/21/90; Ant: Harris FML-3E							
KNSX	LIC TWENTY-ONE SOUNDS COMM,	227C2	8.50	38-06-16	336.2	72.30	55
STEELVILLE	MO BLH-961002KF	93.3	356	91-02-30	156.0	17.30	CLEAR
RM	CLASS CHANGE TO C1 REQUE	227C2		38-06-16	336.2	72.30	55
STEELVILLE	MO DOC-90-66	93.3		91-02-30	156.0	17.30	CLEAR
Deletion proposed; Received at FCC 05/07/90 per FCC release #1816; DOC-90-66; COUNTERPROPOSAL TO DOC-90-66							
KLOU	LIC CBS, INC.	277C1	100	38-31-47	17.4	118.8	22
SAINT LOUIS	MO	103.3	280	90-17-58	197.6	96.83	CLEAR
Was KHTR 10/31/88							
KEMA	CP TWIN EAGLE COMMUNICATION	278C2	50	36-50-50	155.5	80.74	15
POPLAR BLUFF	MO BHPH-930111IF	103.5	99	90-19-52	335.7	65.74	CLEAR
CP Granted 07/28/93 per FCC release #21688 dated 08/03/93; CP Granted 07/28/93 per FCC release #21688 dated 08/03/93; BHPH-960229JA EXT GRD 5/8/96(43736-5/1 3/96); Call Granted 12/12/90 per FCC release #149 dated 12/21/90; Ant: Elec. R es. Inc. SHPX-10AC							


>> End of channel 224A study <<

CERTIFICATE OF SERVICE

I, Myrtle Mitchell, a secretary in the law firm, of Ginsburg, Feldman & Bress, Chartered, do hereby certify that I have on this 22<sup>nd</sup> day of September, 1997, caused to be delivered by first class mail postage prepaid, copies of the foregoing "Comments" to the following.

\*Ms. Kathleen Scheuerle  
Allocations Branch  
Mass Media Bureau  
FCC  
2000 M Street, N.W.  
Washington, DC 20554

Dennis J. Kelly, Esq.  
Law Office of Dennis Kelly  
P.O. Box 6648  
Annapolis, MD 21401

  
Myrtle Mitchell

\* Hand delivered

::ODMA\PCDOCS\GFBDOCS\29027\1